



1000221

Jim Christiansen  
03/20/02 12 44 PM

To Dan Strausbaugh/MO/R8/USEPA/US@EPA  
cc azd9@cdc.gov Dan Strausbaugh/MO/R8/USEPA/US@EPA Glenn  
Tucker/RA/R8/USEPA/US@EPA  
Subject RE Libby RI rationale [1]

Thanks for the quick response I inserted a few thoughts in Jill's comments below  
Dan Strausbaugh

Dan Strausbaugh  
03/18/02 11 06 AM

To Jim Christiansen/EPR/R8/USEPA/US@EPA  
cc Glenn Tucker/RA/R8/USEPA/US@EPA Dan  
Strausbaugh/MO/R8/USEPA/US@EPA azd9@cdc.gov  
Subject RE Libby RI rationale

Jim

Attached are comments resulting from Jill Dyken's (ATSDR) review of the draft screening protocols you developed for Libby. I do not have any additional (or significant) comments of my own to add. Thanks for the opportunity to review the draft. Please call me if you have any questions or comments.

Thanks

Dan Strausbaugh  
ATSDR/Montana Rep  
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Forwarded by Dan Strausbaugh/MO/R8/USEPA/US on 03/18/2002 10 46 AM



Dyken Jill J"  
<Azd9@cdc.gov>  
03/12/2002 12 52 PM

To Dan Strausbaugh/MO/R8/USEPA/US@EPA  
cc  
Subject RE Libby RI rationale

Hi Dan

I looked over these documents and the concept looks reasonable to me. I had just a couple thoughts as listed below - basically just questions to keep in mind as details are worked out.

\* For homes assumed to be contaminated because of the presence of ZAI or source materials in the yard. Will residents accept a cleanup if it has not been shown definitively that their home is contaminated? **Just the presence of ZAI is sufficient to justify action even if it is confined to the attic it poses a risk to any who go up there and a likely potential future risk. I don't think there will be too much problem with acceptance though some won't want the work done no matter what. We won't force our way into homes and we'll be flexible.** How will EPA assess the effectiveness of the cleanup? **A pre cleanup baseline/confirmation/clearance sampling approach will be developed.** Will confirmation sampling be performed after the cleanup? Or does EPA have enough data for homes that have been cleaned up already to prove that the cleanup is effective? **Cleanup is very difficult it has to be done well or it can make it worse and confirmation sampling is crucial. A big key will be developing a rational clearance standard.**

\* For homes assumed NOT to be contaminated because of no ZAI and no primary or secondary source materials Does EPA have enough indoor dust sampling data already to prove that homes meeting this criteria in Libby are not contaminated? If not, it seems some people might question the assumption, given the past high ambient asbestos levels in Libby It's difficult to pick out trends at this point because there are so many factors at work but clearly having zonalite source areas and some of the other factors we are looking for increases the chances of having contaminated dust I don't have a clear quantitative analysis which shows there won't be air contamination present if those factors aren't there Certainly some people will question this (we'll work hard to educate and explain) and certainly we may miss some things The intent is to be very conservative when we implement the screening if we have ANY reason to believe indoors should be looked at or cleaned we'll err on the side of taking further action To take/analyze sufficient air samples for 3000 or so properties would probably run to about \$15 million bucks for sampling/analytical alone A similar approach is being implemented at Western Minerals in Minneapolis

These considerations can probably be addressed with minor clarifications in the documents **The SAP will provide more detail which will be circulated for review shortly**  
Thanks for the opportunity to review

Jill J Dyken Ph D P E  
Environmental Health Scientist

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Division of Health Assessment and Consultation  
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- --Original Message-----

From Strausbaugh Dan@epamail epa gov  
[mailto:Strausbaugh Dan@epamail epa gov]  
Sent Friday, March 08, 2002 4:37 PM  
To azd9@cdc gov  
Subject Libby RI rationale

<< File LibbyCSSscreeningsteps wpd >> << File CSSScreeninggraphical PRZ >>  
Jill

Please look these documents over and give me a call on Monday  
sometime

Thanks,

Dan

--- Forwarded by Dan Strausbaugh/MO/R8/USEPA/US on 03/08/2002 02:35 PM  
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Jim

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cc  
Subject Libby RI rationale

Hey folks Attached are a couple documents that go together which describe the thought process for the remedial investigation (RI) sampling approach I've discussed to some degree with all of you This isn't a stand alone document or meant to be any kind of final product, it's just a summary meant to solicit input and suggestions prior to CDM moving forward with a SAP I wrote a brief lead in/explanation then laid out specific screening steps, then possible scenarios we may encounter & decision points (both written and graphical) Many of the details in this document are glossed over , that doesn't mean we haven't considered them, it means we are still working on them or they weren't important for this There is also plenty of judgement that goes into these questions which isn't reflected here, but I understand the complexity (I've also made the assumption that we will address ZAI) My intent is for everyone to read this carefully, then let me know if the approach makes sense, any changes you suggest, and anything to look for as we get into details (such as sampling and analysis details) I don't need wording or grammatical review unless its something that affects substance, but I do need everyone to think carefully and understand this as it will shape the direction we go on Libby permanently, to the tune of over 3000 properties Tight schedule - please get me any comments or call me by March 19 Once we move past the conceptual, I need everyone to start thinking critically about their particular piece of the pie and how it will need to be modified to fit the approach

Send this to whom you need to get meaningful input, but please don't circulate it too much or let anyone get overly worked up it is only a conceptual draft If you can't open something, call me and I'll fax it Call if you need clarification Contractors - if you are going to spend a little time on this, check with who you have to - consider this a request, not a direction Thanks Jim

(See attached file LibbyCSSscreeningsteps wpd) (See attached file CSSScreengraphical PRZ)